

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

IN RE: Travita S. Wheeler

CASE NO. 14-13677 JDL
CHAPTER 13

MOTION TO MODIFY CONFIRMED CHAPTER 13 PLAN;
APPLICATION FOR COMPENSATION; AND
NOTICE OF OPPORTUNITY FOR HEARING

Travita S. Wheeler, Debtor in the above-captioned Chapter 13 proceeding, would herein request that the Court enter an order modifying the Chapter 13 Plan confirmed by the Court on October 20, 2014, pursuant to 11. U.S.C. §1329. Debtors herein would propose the following modifications to the confirmed Chapter 13 Plan;

1. To provide that Debtor is current on her plan payments through June 2018.
2. That Debtor's have entered into a trial loan modification plan with Midfirst Bank for the months of July 2018, August 2018 and September 2018, which have to pay the mortgage company directly for those months.
3. To provide Debtors' plan payment be decreased to \$500.00 per month of July 2018, August 2018 and September 2018, then increase to \$1,415.00 in October 2018;
4. To suspend the mortgage payments to Midfirst Bank for the months of August 2018, September 2018 and October 2018.
5. To provide that counsel for Debtor receive \$450.00 for services rendered in this matter, to be paid at the rate of \$50.00 per month through the plan pursuant to the Guidelines and without the necessity of filing a fee application for the same.

THEREFORE, premises considered, Debtor respectfully requests this Court to issue an Order Modifying her Chapter 13 Plan.

s/ Reese Allen

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NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effects of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Ave., Oklahoma City, OK 73102 no later than 21 days from the date of the filing of this request for relief. You should also serve a file stamped copy of your response or objection to the undersigned movant/movant's attorney and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the relief without a hearing or further notice.

The 21 day period includes the three (3) days allowed for mailing provided for in Bankruptcy Rule 9006(f).

CERTIFICATE OF MAILING

I, Reese Allen, hereby certify that on the 19th day of June, 2018 I mailed a true and correct copy of the above foregoing document to: John Hardeman, Chapter 13 Trustee, P.O. Box 1948, Oklahoma City, OK 73101 and attached matrix

s/ Reese Allen
Reese Allen

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